

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

ZACK K. DE PIERO,

Plaintiff,

v.

PENNSYLVANIA STATE UNIVERSITY, et. al,

Defendants.

CIVIL ACTION NO: No. 2:23-cv-02281

**JOINT UNOPPOSED STIPULATION FOR EXTENSION OF TIME TO FILE  
OPPOSITIONS TO, AND REPLIES IN SUPPORT OF, MOTION FOR SUMMARY  
JUDGMENT**

Pursuant to Local Rule of Civil Procedure 7.4(B)(2) and Judge Beetlestine's Chambers Policies and Procedures, the parties hereby submit this joint, unopposed stipulation for an extension of time for Plaintiff to file an opposition to Defendants' motion for summary judgment and for Defendants to file a reply in support of their motion for summary judgment in this matter.

In support thereof, the parties state as follows:

1. On October 3, 2024, the Court approved the parties' Joint Stipulation setting the deadline for Plaintiff to file a response to Defendants' motion for summary judgment as November 25, 2024 (ECF 51).

2. Per Judge Beetlestine's Chambers Policies and Procedures, the current deadline for Defendants to file a reply in support of their motion for summary judgment in this case is December 2, 2024.

3. The parties respectfully request an additional two (2) days, until November 27, 2024, for Plaintiff to file a response to Defendants' motion for summary judgment, as well as

his statement of disputed material facts.

4. The parties also respectfully request an additional seven (7) days, until **December 11, 2024**, for Defendants to file a reply in support of their motion for summary judgment, as well as their reply statement of undisputed material facts.

5. The parties are requesting this extension in light of the timing of the upcoming Thanksgiving holiday on November 28, 2024 and other matters beyond the parties' control. This extension would account for the fewer business days during the holiday week and accommodate defense counsel's schedules, which coincide with the seven-day period to prepare and file a reply brief and reply to plaintiff's statement of disputed material facts.

6. This request does not impact any other case deadlines or trial dates.

7. The parties are happy to discuss this request with Your Honor at any time.

Respectfully Submitted,

Dated: November 22, 2024

/s/ Michael Thad Allen  
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*Attorneys for Defendants*

**SO ORDERED AND APPROVED:**

**Date: November \_\_, 2024**

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**Beetlestone, J.**